

John G. Balestriere  
Jillian L. McNeil  
**BALESTRIERE FARIELLO**  
225 Broadway, 29th Floor  
New York, New York 10007  
Telephone: (212) 374-5401  
Facsimile: (212) 208-2613  
john.balestriere@balestrierefariello.com  
jillian.mcneil@balestrierefariello.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**HILLARY LAWSON, KRISTINA  
HALLMAN, and STEPHANIE  
CALDWELL,**

Plaintiffs,

- against -

**HOWARD RUBIN, JENNIFER POWERS,  
YIFAT SCHNUR, STEPHANIE SHON,  
JOHN DOE, BLUE ICARUS, LLC, and the  
DOE COMPANY.**

Defendants.

Case No.: 1:17-cv-06404

**PLAINTIFFS' NOTICE OF  
MOTION FOR A PROTECTIVE  
ORDER**

**PLEASE TAKE NOTICE** that, upon the annexed Motion for a Protective Order, Complaint, RICO Case Statement, and upon all pleadings and proceedings heretofore had herein, Plaintiff will move this court in the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on such a date and time to be determined by the Court, for Protective Order pursuant to N.Y. Civil Rights Law § 50-b.

Dated: New York, New York  
November 2, 2017

By: /s/ John G. Balestriere  
John G. Balestriere  
Jillian L. McNeil  
**BALESTRIERE FARIELLO**  
225 Broadway, 29th Floor  
New York, New York 10007  
Telephone: (212) 374-5401  
Facsimile: (212) 208-2613  
john.balestriere@balestrierefariello.com  
jillian.mcneil@balestrierefariello.com  
*Attorneys for Plaintiff*